

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

SHANE FISHER  
Plaintiff,

v.

CHEVRON PHILLIPS  
COMPANY LP  
Defendant.

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*October 27, 2020*

David J. Bradley, Clerk of Court

Civil Action No. 4:19-cv-04930

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**MOTION OF THE UNITED STATES TO UNSEAL  
DOCUMENTS  
FILED BY CHEVRON PHILLIPS CHEMICAL COMPANY'S**

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NOW COMES the Plaintiff, Shane J. Fisher, request that this Court issue an order directing the Clerk of the Court to make public all documents and supplementals entered by the United States filed by Chevron Phillips Chemical Company LP's Motion for Settlement Enforcement submitted under seal.

**Background**

Chevron Phillips Chemical Company LP, filed its Motion for Enforcement of Settlement using e-mails that both parties were known to be confidential. Verbal acknowledgment and confirmation that NO communication was to be used in COURT to enforce any action against the Plaintiff. Chevron Phillips Chemical Company did not comply. Pro Se, Plaintiff now seeks to oppose the Defendants Motion, acquiring information to defend position.

In addition, Chevron Phillips Chemical Company LP, is continuing to claim the Plaintiffs own information as proprietary information to even the Plaintiffs own medical records, financial records, and others in regard to his employment with the company.

## II. ARGUMENT

### A. Chevron Phillips Failed to Show Good Cause Pursuant to Fed. R. Civ.P 26(c)(7),

Why Any Chevron Phillips Chemical Company LP Document Should Be Filed

Under Seal

Rule 26(c)(7) permits a protective order be issued for “trade secret or other confidential research.

No trade secrets, nor confidential research are disclosed in the documents filed.

Respectfully Submitted on this date of October 14, 2020.

/s/ Shane J. Fisher

Shane J. Fisher  
Pro Se Plaintiff

4910 Culmore Drive  
Houston, TX 77021  
Telephone: (832) 361-1250

## CERTIFICATE OF SERVICE

This is to certify on this 14<sup>th</sup> date October, 2020, a true and correct copy of the foregoing was served through email to CPChem:

Marlene C. Williams  
Fed ID. 22824  
1001 Fannin, Suite 3700  
Houston, TX 77002  
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